

DENNIS M. PRINCE  
Nevada Bar No. 5092  
KEVIN T. STRONG  
Nevada Bar No. 12107  
**PRINCE LAW GROUP**  
10801 W. Charleston Boulevard  
Suite 560  
Las Vegas, Nevada 89135  
Tel: (702) 534-7600  
Fax: (702) 534-7601  
E-mail: [eservice@thedplg.com](mailto:eservice@thedplg.com)

-AND-  
FARHAN R. NAQVI  
Nevada Bar No. 8589  
ELIZABETH E. COATS  
Nevada Bar No. 12350  
**NAQVI INJURY LAW**  
9500 W. Flamingo Road, Suite 104  
Las Vegas, Nevada 89147  
Tel: (702) 465-8733  
Fax: (702) 553-1002  
Attorneys for Plaintiffs  
*Kelsy Arlitz and Gary Arlitz and Karie Arlitz*  
*as General Guardians of Kelsy Arlitz*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KELSY ARLITZ, individually; GARY  
ARLITZ, as general guardian of ward KELSY  
ARLITZ; KARIE ARLITZ, as general  
guardian of ward KELSY ARLITZ,

Plaintiffs,

vs.

GEICO CASUALTY COMPANY; DOES 1  
through 100 and ROE CORPORATIONS 1  
through 100, inclusive,

Defendants.

Case No.: 2:19-cv-00743-RFB-DJA

**STIPULATION AND**  
**[PROPOSED] ORDER TO**  
**EXTEND DEADLINE FOR**  
**PLAINTIFFS TO FILE THEIR**  
**RESPONSE TO DEFENDANT**  
**GEICO CASUALTY COMPANY'S**  
**MOTION FOR SUMMARY**  
**JUDGMENT ON COVERAGE**  
**AND DUTY TO DEFEND (ECF**  
**NO. 50) AND TO EXTEND**  
**DEADLINE FOR PLAINTIFFS**  
**TO FILE THEIR RESPONSE TO**  
**DEFENDANT'S MOTION TO**  
**STAY DISCOVERY (ECF NO. 54)**

**(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs KELSY  
ARLITZ, individually; GARY ARLITZ, as general guardian of ward KELSY ARLITZ,



1 and KARIE ARLITZ, as general guardian of ward KELSIE ARLITZ, through their  
2 counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and  
3 Defendant GEICO CASUALTY COMPANY, through its counsel of record, Wade M.  
4 Hansard and Jonathan W. Carlson of McCORMICK, BARSTOW, SHEPPARD, WAYTE  
5 & CARRUTH LLP, that the deadline for Plaintiffs to file their Response to Defendant  
6 GEICO Casualty Company's Motion for Summary Judgment on Coverage and Duty to  
7 Defend (ECF No. 50) shall be extended from September 9, 2020 to September 18, 2020.  
8 The Motion was filed on August 19, 2020. This is the first request for extension of time  
9 for Plaintiffs to file their Response to the Motion.

10 IT IS FURTHER STIPULATED AND AGREED that the deadline for Plaintiffs to  
11 file their Response to Defendant GEICO Casualty Company's Motion to Stay Discovery  
12 (ECF No. 54) shall be extended from September 8, 2020 to September 18, 2020. The  
13 Motion was filed on August 24, 2020. This is the first request for extension of time for  
14 Plaintiffs to file their Response to the Motion. This Stipulation and [Proposed] Order is  
15 submitted in accordance with LR IA 6-1.

16 The purpose for the parties' request is that Plaintiffs' undersigned counsel has  
17 been away from the office over the course of the last several weeks to address several  
18 personal issues that have arisen from the listing and sale of his home. The parties  
19 continue to address a separate issue regarding the depositions of GEICO's claims  
20 personnel and whether such depositions shall proceed later this month, which has also  
21 taken substantial time and effort. Given that GEICO's summary judgment motion is 30  
22 pages long and seeks case-concluding relief, additional time is needed for Plaintiffs to  
23 fully address and respond to all of GEICO's arguments set forth in the motion. The  
24 motion to stay discovery is also interrelated to the summary judgment motion, and an  
25 extension of time will allow Plaintiffs to fully address those issues as well. The brief  
26 extension of time requested will ensure that all issues presented to this Court are fully  
27 addressed, which will ultimately aid this Court in its decision.

28 ...

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Accordingly, the parties respectfully request this Court to approve the foregoing stipulation. Their requested extension is not made in bad faith or to unnecessarily delay these proceedings.

DATED this 8th day of September, 2020.

DATED this 8th day of September, 2020

**PRINCE LAW GROUP**

**McCORMICK, BARSTOW,  
SHEPPARD, WAYTE & CARRUTH  
LLP**

/s/ Kevin T. Strong

/s/ Wade M. Hansard

DENNIS M. PRINCE  
Nevada Bar No. 5092  
KEVIN T. STRONG  
Nevada Bar No. 12107  
10801 W. Charleston Boulevard  
Suite 560  
Las Vegas, Nevada 89135  
-AND-  
NAQVI INJURY LAW  
FARHAN R. NAQVI  
Nevada Bar No. 8589  
9500 West Flamingo Road, Suite 104  
Las Vegas, Nevada 89147  
Attorneys for Plaintiffs

WADE M. HANSARD  
Nevada Bar No. 8104  
JONATHAN W. CARLSON  
Nevada Bar No. 10536  
RENEE M. MAXFIELD  
Nevada Bar No. 12814  
8337 West Sunset Road, Suite 350  
Las Vegas, Nevada 89113  
Attorneys for Defendant

**ORDER**

**IT IS SO ORDERED.**

DATED this 11th day of September, 2020.

  
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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE